


UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2024 AUG 22 PM 3: 24

CLERK

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UNITED STATES OF AMERICA

v.

NASIR HUSSAIN

Defendant.

Case No. 2:23-cr-56-CR

2:23-cr-56-3

(18 U.S.C. § 1349)

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT 1

The Conspiracy

1. Beginning in or about April 2018 and continuing through in or about September 2023, in the District of Vermont and elsewhere, Defendant NASIR HUSSAIN and others known and unknown to the Grand Jury, knowingly and willfully conspired to commit wire fraud, that is to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and to transmit and cause to be transmitted by interstate wire, writings, signs, and signals for the purpose of executing the scheme.

Object of the Conspiracy

2. It was the object of the conspiracy to obtain money from victims, normally U.S. residents over 60 years of age, by convincing the victims to transfer funds from their bank accounts to individuals the victims did not know.

Manner and Means of the Conspiracy

3. In furtherance of the scheme, members of the conspiracy utilized a variety of ruses via interstate wire communications to misrepresent themselves as agents of well-known retail businesses seeking to update subscription payment arrangements with the victims; and

4. Once members of the conspiracy made contact with the victims, the conspirators would induce the victims, under false and fraudulent pretenses, to transfer money from victims' bank accounts to bank accounts controlled directly or indirectly by other members of the conspiracy.

5. Defendant NASIR HUSSAIN and other members of the conspiracy received funds from scheme victims into bank accounts they opened for the purpose of receiving victim funds. Defendant NASIR HUSSAIN further directed other individuals to open additional bank accounts for the purpose of receiving victim funds.

6. Once the funds were received, Defendant NASIR HUSSAIN transferred or caused to be transferred the victim funds to recipients in India.

7. Defendant NASIR HUSSAIN and others known and unknown to the Grand Jury actively and continuously recruited, directed, supervised, and managed numerous additional people to use their identities to open and obtain access to additional bank accounts, under multiple identities at a variety of banks in order to continue to receive and transfer victim funds without detection by banking institutions.

8. In furtherance of the scheme, on or about April 11, 2018, conspirators known and unknown to the Grand Jury caused Vermont Victim 1, a resident of Vermont, to transfer \$7,000 to a bank account which was not in Vermont in the name of Defendant NASIR HUSSAIN.

9. In furtherance of the scheme, on or about February 19, 2021, conspirators known


and unknown to the Grand Jury attempted to cause Vermont Victim 3, a resident of Vermont, to transfer \$25,000 to a bank account controlled directly or indirectly by Defendant NASIR HUSSAIN and others known and unknown to the Grand Jury, which account was not in Vermont and was accessed using an internet protocol address at a residence of Defendant NASIR HUSSAIN.

10. In furtherance of the scheme, on or about May 23, 2022, conspirators known and unknown to the Grand Jury caused Vermont Victim 2, a resident of Vermont, to transfer \$25,000 to a bank account controlled directly or indirectly by Defendant NASIR HUSSAIN and others known and unknown to the Grand Jury, which account was not in Vermont and was accessed using an internet protocol address tied to the residence of Defendant NASIR HUSSAIN.

(18 U.S.C. § 1349)

A TRUE BILL


FOREPERSON


NIKOLAS P. KEREST (EAPC, CGO)
United States Attorney
Burlington, Vermont
August 22, 2024